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BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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MAILING ONLINE SERVICE

Docket No. MC98-1

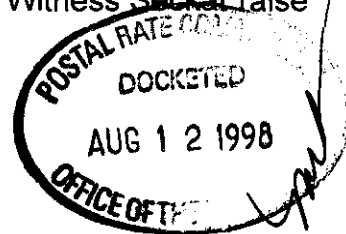
POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

**PITNEY BOWES' SECTION 67A(b) STATEMENT**

In a pleading responsive to the Motion of the United States Postal Service for Expedition, and for Waiver of Certain Provisions of Rule 161 and Certain Provisions of Rule 164(h), Pitney Bowes asked that the Commission substantially revise the schedule requested in the Postal Service's proposal for a market test and rate experiment concerning its Mailing Online service. If the Commission grants the relief requested by Pitney Bowes, we submit that the statements called for in the paragraph numbered 4 of the ordering clauses of PRC Order No. 1216 are premature and the filings that are called for should be re-scheduled to follow the Commission's action on the market test request.

As a protective measure, however, Pitney Bowes submits the following:

1. The "USPS Information Systems cost" testimony presented by Witness Seckar raises genuine issues of material fact;
2. The "contractual printer cost" testimony presented by Witness Seckar raises genuine issues of material fact;
3. The Mailing Online volumes presented by Witness Seckar raise genuine issues of material fact;



4. The propriety of waiving otherwise applicable DMCS requirements for the Mailing Online postage raises genuine issues of material fact.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Ian D. Volner", with a stylized flourish extending to the left.

Ian D. Volner  
N. Frank Wiggins  
Venable, Baetjer, Howard & Civiletti, LLP  
1201 New York Avenue, N.W.  
Suite 1000  
Washington, DC 20005-3917

Aubrey M. Daniel III  
Carolyn H. Williams  
Williams & Connolly  
725 12th Street, NW  
Washington, DC 20005


Counsel for Pitney Bowes Inc.

August 12, 1998

**CERTIFICATION**

**001380**

I hereby certify that I have this day served the foregoing document upon the United States Postal Service and the Office of the Consumer Advocate in this proceeding in accordance with section 12 of the rules of practice and the Commission's Order No. 1216.

  
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Ian D. Volner